From: Tasya Gray
To: Knittel, Janette
Subject: RE: additional questions/analyses - Rhone-Poulenc/Container Properties
Date: Wednesday, March 02, 2022 3:54:20 PM

Received, thanks Janette, will review. I dug around and couldn't find a summary table of that earlier SVOC data from 2015, so it might only be in the lab reports and possibly queriable from the database- I'll check there in case we can at least provide a data dump sort of summary for you.
Tasya

From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Wednesday, March 2, 2022 3:49 PM
To: Tasya Gray <ngray@dofnw.com>
Cc: King, Aaron S CIV USARMY CENWK (USA) <Aaron.S.King@usace.army.mil>; Tahiry, Howasta <Tahiry.Howie@epa.gov>; Clabaugh, Charles D. <clabaugh.charles@epa.gov>
Subject: additional questions/analyses - Rhone-Poulenc/Container Properties

Hi Tasya,

I've talked through your February 15th responses with my project team and we have the following questions and a few more additions to the sampling list, as you and I discussed last week. Note that we only considered wells that already are part of the program or have been sampled recently, and therefore would not require redevelopment and would be ready to sample.
-Janette

TABLE
Thank you for putting together the summary table of the Round 95 sampling locations plus the additional locations. We noticed some discrepancies between this table and the prior version you had sent us. Please explain the following:

- Total Iron (MW-43, MW-44, MW-53, MW-54, and IMW-A1-D) was removed from the past version.
- Dissolved Copper in MW-43, MW-44, MW-54 was removed from the past version.
- Dissolved Iron in MW-43, MW-44, MW-53, and MW-54 was removed from the past version.
- Pentachlorophenol in MW-12 was removed from the past version (presumably because it will be analyzed for full SVOCs instead; see below).
- B1A U needs to be added to the table because it is part of the semiannual sampling per the Round 95 monitoring locations figure in the progress report dated January 10, 2022.

METALS

- Add total copper analysis for samples from wells MW-22, DM-4, and EX-1.

SVOCs

- Analyze samples from MW-41 and MW-53 for full SVOCs instead of only pentachlorophenol.*
- Verify that MW-12 groundwater, not just a potential NAPL sample, definitely will be analyzed for full SVOCs and PCBs.

DIOXINS/FURANS

- We considered your justification for not collecting additional dioxin/furan samples during this event. We find that it does not sufficiently explain or provide enough information to know whether there is source farther upland without conducting further analysis. Add additional dioxin/furan analysis – the locations we suggest are MW-22, EX-1, DM-4, and possibly B1A U.

METHYLMERCURY

- Please check your records to see if shoreline groundwater has been sampled for methylmercury. Round 93 shows mercury was detected above the draft PRG at various monitoring wells both inside and outside the barrier wall. Wells outside the wall (MW-40, MW-41, MW-43, and MW-44) show anoxic conditions (dissolved oxygen measurements of 0.11 mg/L, 0.19 mg/L, 0.04 mg/L, and 0.03 mg/L respectively). Anoxic conditions with concentrations of mercury can lead to methylmercury which is highly toxic. We suggest sampling these wells for methylmercury.

*Explanation re: SVOCs – As shown in your response to EPA's previous questions, benzo(b)fluoranthene was detected above its surface water PRG at 0.002J ug/L in MW-44U, which is outside the barrier wall. This concentration is ~5.4x its surface water PRG. Because there was a surface water SVOC PRG exceedance outside the barrier wall, we are interested in understanding if a nearby well outside the wall and a nearby well inside the wall also have recent SVOC PRG exceedances. MW-41U and MW-53U fit that criteria and don't appear to have been recently sampled for SVOCs, and since DOF is already planning to sample them for pentachlorophenol, we would like to sample those wells for SVOCs. We are not totally comfortable with the argument that a) historically, SVOC concentrations other than pentachlorophenol have been fairly low, and b) pentachlorophenol will really be the driver for SVOCs (we recognize the recent concentration in MW-44 was 0.109 ug/L, which is ~39x its surface water PRG). Instead, our line of thinking is that an exceedance of a PRG is important to delineate in order to fully understand the nature/extent and risks related to site contamination, even if the concentrations are "low."

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